

PS Funding\138 Nobility Court - 138 Nobility LLC\Motion for Relief from Automatic Stay - Notice of Motion

CHARTWELL LAW

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 as Owner Trustee of LH-NP-STRAT Delaware Owner
 Trust, a Delaware Statutory Trust

In re:	:	UNITED STATES BANKRUPTCY COURT
138 NOBILITY LLC,	:	DISTRICT OF NEW JERSEY
Debtor.	:	Trenton Vicinage
	:	Chapter 7 Case No. 22-15395-KCF
US BANK TRUST NATIONAL	:	
ASSOCIATION, not in its Individual	:	
Capacity but Solely as Owner Trustee of	:	
LH-NP-STRAT Delaware Owner Trust,	:	
a Delaware Statutory Trust,	:	Hearing Date: August 23, 2022, 10:00 A.M.
Movant,	:	Responses Due: August 16, 2022
v.	:	Oral Argument Requested if Opposed
138 NOBILITY LLC,	:	
Respondent.	:	
	:	

**NOTICE OF MOTION, ALTERNATIVELY, FOR ADEQUATE PROTECTION,
 RELIEF FROM THE AUTOMATIC STAY, TO PROHIBIT OR CONDITION
 USE OF CASH COLLATERAL, OR DISMISSAL OF CASE, PURSUANT TO
 11 U.S.C. §§105(a), 361(2), 362(d)(1), 362(d)(2), 363(a), (c)(2) AND (e), AND 707(a)(1),
 FILED ON BEHALF OF PS FUNDING, INC. AND U.S. BANK TRUST NATIONAL
 ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY
 AS OWNER TRUSTEE OF LH-NP-STRAT DELAWARE OWNER TRUST,
A DELAWARE STATUTORY TRUST**

PLEASE TAKE NOTICE that on August 23, 2022, at 10:00 a.m., or as soon thereafter as counsel may be heard, Chartwell Law, counsel to **U.S. Bank Trust National Association, not in its individual capacity but solely as owner trustee of LH-NP-Strat Delaware Owner Trust, a Delaware statutory trust (“US Bank Trust”)**, a secured creditor of the above-captioned debtor and party in interest herein, shall move before the Honorable Kathryn C. Ferguson, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of New Jersey, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608, in Courtroom No. 2, for an Order, Alternatively for Adequate Protection, Relief from the Automatic Stay, to Prohibit or Condition Use of Cash Collateral, or Dismissal of Case, Pursuant to 11 U.S.C. §§105(a), 361(2), 362(d)(1), 362(d)(2), 363(a), (c)(2) and (e), and 707(a)(1).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, US Bank Trust shall rely upon the within Application and Certification.

PLEASE TAKE FURTHER NOTICE that any objections to the relief requested by PSF shall: (i) be in writing; (ii) specify with particularity the basis of the objections; and (iii) be filed with the Clerk of the United States Bankruptcy Court, electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing and Verification of Documents, dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures, dated as of March 2004 (the “Supplemental Commentary”) (the General Order, Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court), and by paper copy to all other parties in interest, and shall be simultaneously served on Chartwell Law, 970 Rittenhouse Road, Suite 300, Eagleville, PA 19403 (Attention: John J. Winter, Esq.), in accordance with the General Order, the Supplemental Commentary, and D.N.J. LBR 9013-1, so as to be received by no later than seven (7) days before the hearing date, i.e., August 16, 2022.

CHARTWELL LAW

Dated: July 26, 2022

By: /s/ John J. Winter
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*(Attorneys for U.S. Bank Trust National
Association, not in its individual capacity but
solely as owner trustee of LH-NP-Strat Delaware
Owner Trust, a Delaware statutory trust)*